

Monsanto

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RECEIVED

October 11, 1995

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RCOM SECTION

Mr. Ed Sadler, Director
Hazardous Waste Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

**RE: Closure of Permitted Hazardous Waste
Container Storage Area
Monsanto Company - J.F. Queeny Plant
EPA Id. No. MOD004954111**

Dear Mr. Sadler:

This is a request for your assistance in receiving concurrence from the Missouri Department of Natural Resources that Monsanto has achieved clean closure of its permitted hazardous waste container storage area. Monsanto-Queeney Plant began the closure process in a letter dated September 9, 1994, to the Director of the Missouri Department of Natural Resources. This letter notified the Department that Monsanto was to begin closure of its permitted container storage area on or about October 17, 1994, in accordance with the approved closure plan.

Closure of the permitted area was performed on October 20 and 21, 1994 and certification by an independent registered professional engineer was submitted to the Director on November 29, 1994. The Department performed an inspection of the closed area on December 21, 1994 and the findings were reported to Monsanto in a letter dated January 11, 1995.

This January 11th letter stated that the Department "has determined that Monsanto had not obtained clean closure of its container storage area" and the letter also provided some "suggestions that Monsanto may follow to achieve clean closure." The determination that clean closure had not been accomplished was made by the Department based upon an error in reading and reviewing the laboratory data supplied by Monsanto, as part of the closure certification. This error involved the interpretation of the levels of contaminants in the final rinse water from the

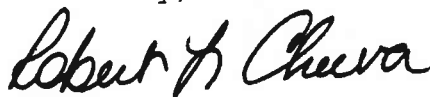
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closure process. The values reported by the laboratory were in micrograms per liter (ug/l) however the Department read them as milligrams per liter (mg/l), a difference of a thousand fold. The Department recognized its error in a teleconference of February 14, 1995 but went on to note "that this error has no effect on the recommendations stated in the closure report."

One of the suggestions made in the January 11th letter was that Monsanto could "perform a risk assessment to determine the possible hazard of the container storage area to the environment, if the pad is left in place." A series of telephone conversations followed, to gain consensus on how Monsanto should proceed to achieve clean closure. It was agreed that a risk assessment be performed which in fact was done, and the completed risk assessment was forwarded to the Department on March 13, 1995. There has been no official response from the Department since the March submittal. Monsanto would like to bring this issue to a satisfactory conclusion and are requesting your assistance in accomplishing this goal.

If you have any questions or need additional information, please feel free to give me a call at 314-622-1641.

Sincerely,



Robert L. Cheever
Environmental, Health and
Quality Control Superintendent

cc: 

MDNR -- St. Louis Office